

Sills Cummis & Gross
A Professional Corporation

The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
Tel: (973) 643-7000
Fax (973) 643-6500

Stephen M. Klein
Member
Admitted In NJ, NY
Direct Dial: 973-643-4775
Email: sklein@sillscummis.com

101 Park Avenue
28th Floor
New York, NY 10178
Tel: (212) 643-7000
Fax: (212) 643-6500

August 18, 2023

VIA CM/ECF

Hon. Michael A. Hammer, U.S.M.J.
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street Room 4015
MLK 2C
Newark, NJ 07101

Re: *Emerson Redevelopers Urban Renewal, LLC v. Borough of Emerson, et al.*
Docket No.: 2:20-cv-04728-MCA-MAH

Dear Judge Hammer:

We represent Plaintiff and write jointly with Defendants pursuant to the Court's text order dated July 25, 2023, directing the parties to meet and confer in an attempt to resolve the issues raised by Defendants' July 25, 2023 letter and set forth an amended schedule, if any. [Dkt. No. 61]. The parties propose the following amended schedule.

Event	Proposed Date
Defendants shall serve a Supplemental Notice to Produce (the "Supplemental Notice") directed solely to issues raised by D. Cahn in the July 11, 2023 disclosure from Plaintiff.	August 21, 2023
Plaintiff shall provide responses, objections, and a supplemental production of documents in response to the Supplemental Notice.	September 15, 2023
Completion of the deposition of D. Cahn, and any other witness to the extent the deposition concerns an issues raised by the July 11, 2023 disclosure or supplemental production.	October 30, 2023
Service of Defendants' expert report in response to the reports of E. Keller and A. Bernard.	October 30, 2023
Service of Defendants' expert damages report.	December 15, 2023
Completion of expert depositions.	January 30, 2024

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August 18, 2023
Page 2

If this schedule meets with Your Honor's approval, the parties request that the Court "so order" this letter.

We thank Your Honor for your courtesies in this matter.

Respectfully submitted,

s/Stephen M. Klein

Stephen M. Klein

All counsel of record (via CM/ECF)